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VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Gu Seon Song v. Shinhan Bank America (21-cv-11207)

Dear Hon. Paul A. Engelmayer:

We represent the Defendants, Shinhan Bank America in the aforementioned action. We write to inform the Court that we consent to the agreed case management plan as per Plaintiff's deficiency letter. Plaintiff is asking for documents that do not exist, for instance, a number of requests pertaining to board meetings, at which Plaintiff's termination was discussed. We have already produced the minutes of that particular meeting. Plaintiff is seeking additional records relating to that meeting including individual board members' notes. The company is not in possession of any such documents. Likewise, through half of dozens of these requests Plaintiff's counsel is seeking documents pertaining to the delivery and/or service of the termination letter. Yet, as Plaintiff himself is aware there are no such documents because he was handed the termination notice in person. To be clear, Defendant are not in possession of any documents responsive to Plaintiff's identifying request.

Thank you for your consideration.

Sincerely,

/s/*Vincent M. Avery*

VINCENT M. AVERY

VMA/ts

cc: All Attorneys of Record (*via ECF*)